UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

RURAL ROUTE 3 HOLDINGS, L.P.,

Plaintiff,

Case No.: 3:17-cv-01948

v.

PATRICK A.P. DE MAN,

Defendant.

MOTION SUBMITTING CERTIFIED ENGLISH TRANSLATIONS

TO THE HONORABLE COURT:

COMES NOW Plaintiff Rural Route 3 Holdings, L.P. ("RR3"), through its undersigned legal counsel, and very respectfully states and prays as follows:

1. On August 10, 2017, RR3 filed *Rural Route 3 Holdings, LP's Motion in Compliance with Order (Docket No. 14) ("Motion in Compliance").* See, Docket 15.

2. In support of the allegations included in the *Motion in Compliance*, RR3 attached certain exhibits containing copies of emails in their original Spanish language. See, Docket 15 at Exhibits A and B.

3. Also, on August 10, 2017, RR3 filed a *Motion for Leave to File in Spanish Language and for Brief Extension of Time to Submit Certified English Translations*, requesting one (1) additional day to submit certified English translations of Exhibits A and B of the the *Motion in Compliance*. <u>See</u>, Docket No. 16. On the same date, this Honorable Court granted RR3's request. See, Docket No. 20.

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4. Accordingly, RR3, in compliance with Local District Court Rule 5(g),

procured a certified English translation of Exhibits A and B of the Motion in Compliance.

5. Therefore, RR3 hereby respectfully submits as exhibits of this motion the

certified English translations of Exhibits A and B of the *Motion in Compliance*, as prepared by the U.S. Certified Court Interpreter Olga M. Alicea (Fed. Cer. No. 98-005).

WHEREFORE, Rural Route 3 Holdings, L.P., respectfully requests that the

Honorable Court take note of the foregoing and admit into the record the certified English

translations tendered herewith.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 11th day of August, 2017.

CERTIFICATE OF SERVICE: I hereby certify that on this same date a true and exact copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to the parties of record.

BARNES & THORNBURG LLP

Attorneys for Plaintiff 11 South Meridian Street Indianapolis, IN 46204-3535 Tel: (317) 231-7748 Fax: (317) 231-7433

By: <u>s/ T. Joseph Wendt</u> T. Joseph Wendt E-mail: Joseph.Wendt@btlaw.com

O'NEILL & BORGES LLC

Attorneys for Plaintiff 250 Muñoz Rivera Avenue, Suite 800 San Juan, PR 00918-1813 Tel: (787) 764-8181 Fax: (787) 753-8944

By: <u>s/Alfredo F. Ramírez-Macdonald</u> Alfredo F. Ramírez-Macdonald USDC No. 205208 E-mail: alfredo.ramirez@oneillborges.com

By: <u>s/ Ana Margarita Rodríguez-Rivera</u> Ana Margarita Rodríguez-Rivera USDC No. 227503 E-mail: ana.rodriguez@oneillborges.com

By: <u>s/Arturo L.B. Hernández-González</u> Arturo L.B. Hernández-González USDC No. 304601 E-mail: arturo.hernandez@oneillborges.com <u>CERTIFIED TRANSLATION</u>

by: Olga M. Alicea, fcci, njitce-s

From: Ana Margarita Rodríguez Rivera Sent: Wednesday, July 12, 2017 7:22 PM To: Roberto Cámara Fuertes; Jaime Torrens Dávila Cc: Alfredo F. Ramirez Macdonald; Arturo L. Hernández González Subject: Rural Route 3 Holdings LP v. Patrick de Man

Dear Counselors

Attached you will find a courtesy copy of a Complaint and its exhibits filed before the United States District Court for the District of Puerto Rico against Mr. de Man.

Cordially,

Ana Margarita Rodríguez Rivera O'NEILL & BORGES LLC | 250 Ave. Muñoz Rivera, Ste. 800 | San Juan, P.R. 00918-1813 D. 787-282-5798 | T. 787-764-8181 | F. 787-753-8944 | www.oneillborges.com

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CERTIFICATION

I, OLGA M. ALICEA, AN ENGLISH-SPANISH INTERPRETER AND TRANSLATOR CERTIFIED TO THAT EFFECT BY THE Administrative Office of the U.S. Courts and by the National Association of Judiciary Interpreters & Translators (NAJIT), do hereby certify that I have personally translated the foregoing document from Spanish to English and that the translation is true and accurate to the best ofmy knowledge and abilities. S/ OLGA M. ALICEA OLGA M. ALICEA, FCCI, NJITCE-S, Fed. Cert. No. 98-005 DATE Case 3:17-cv-01948-JAG-BJM Document 23-2 Filed 08/11/17 Page 1 of 1

<u>CERTIFIED TRANSLATION</u>

by: Olga M. Alicea, fcci, njitce-s

From: Arturo L. Hernández González
Sent: Monday, August 07, 2017 7:31 PM
To: Roberto Cámara Fuertes; Jaime Torrens Dávila
Cc: Ana Margarita Rodríguez Rivera; Alfredo F. Ramirez Macdonald
Subject: Rural Route 3 Holdings, L.P. v. Patrick A.P. de Man, Case No. 17-1948

Dear Roberto Cámara Fuertes, Esq., and Jaime Torrens Dávila, Esq.:

Attached a courtesy copy of the documents filed during this day in the referenced case.

With nothing further, cordial regards,

Arturo L. Hernández González **O'NEILL & Borges LLC** 250 Ave. Muñoz Rivera, Ste. 800 | San Juan, P.R. 00918-1813 D. 787-764-8181 | T. 787-764-8181 | F. 787-753-8944 | <u>www.oneillborges.com</u>

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